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**Application for Admission Pro Hac Vice Forthcoming*

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Alliance of Christian Leaders of the East Valley; Magdalena Schwartz, in her individual capacity and as president pastor of Alliance of Christian Leaders of the East Valley; Iglesia Alfa y Omega; Elias Garcia, in his individual capacity and as pastor of Iglesia Alfa y Omega; Iglesia Monte Vista; Angel Campos, in his individual capacity and as pastor of Iglesia Monte Vista; Iglesia Nueva Esperanza; Israel Camacho, in his individual capacity and as pastor of Iglesia Nueva Esperanza; Iglesia Apostolica; Helping With All My Heart, Inc., an Arizona non-profit corporation; Cristobal Perez, in his individual capacity and as pastor of Iglesia Apostolica De La Comunidad; Iglesia Cristiana El Buen Pastor; Hector

No.

COMPLAINT

Ramirez, in his individual capacity and
as pastor of Iglesia Cristiana El Buen
Pastor; Terence Driscoll,

Plaintiffs,

v.

Patriot Movement AZ; AZ Patriots;
Jennifer Harrison; Sean Harrison; Lesa
Antone; Russell Jaffe; Jeremy Bronaugh;
Antonio Foreman; Laura Damasco; Tami
Jo Garver; Michael Pavlock; “Brandi
Payne”; Jane Roe; “Eduardo Jaime”;
John Does 1 & 2,

Defendants.

INTRODUCTION

1. Plaintiffs are churches; an alliance including these and other churches; pastors; and other individuals who have been working together and with United States Immigration and Customs Enforcement (“ICE”) to assist asylum seekers, refugees, and immigrants (collectively, “Immigrants”) after they are released from ICE custody.

2. Defendants are two unincorporated associations, their members, and their supporters, who are motivated, at least in part, by animus against Central Americans and people of color. Through their illegal actions, they are attempting to prevent Plaintiffs from assisting Immigrants from Central America and Immigrants who are people of color.

3. Plaintiffs seek a permanent injunction against Defendants’ illegal conduct as well as appropriate damages. Plaintiffs do not ask this Court to stop Defendants from expressing their opinions, but rather that they be ordered to stay off of church property and within a safe distance of the churches. Plaintiffs also ask that Defendants be ordered to stop illegally intimidating, threatening, harassing or otherwise interfering with Plaintiffs’ ability to invite guests onto their property and into their buildings or homes.

JURISDICTION AND VENUE

4. The subject matter and parties fall under this Court’s jurisdiction under 28 U.S.C. § 1331.

5. The Court has jurisdiction over Plaintiffs’ state law claims pursuant to 28 U.S.C. § 1367.

6. Plaintiffs' claims arise from actions in the Phoenix metropolitan area and, therefore, venue is proper in this district pursuant to 28 U.S.C. § 1391(b).

PARTIES

Plaintiffs

7. Alliance of Christian Leaders of the East Valley ("Alliance") is a nonprofit organization comprised of pastors of several Hispanic churches in the Phoenix metropolitan area.

8. The Alliance is dedicated to community service. For example, the Alliance hosts a yearly breakfast for local law enforcement officials.

9. Magdalena Schwartz is a pastor and a resident of Mesa, Arizona.

10. Pastor Schwartz is the founder and head pastor of the Alliance.

11. Pastor Schwartz is the founder of the Academia de Capellania Llamados Para Servir (Academy of Chaplains Called to Serve), a nonprofit organization that trains chaplains to serve the Phoenix community.

12. Iglesia Alfa y Omega is a bilingual, non-denominational Christian church in Phoenix, Arizona.

13. A majority of the members of Iglesia Alfa y Omega identify as Hispanic.

14. Elias Garcia is the senior pastor of Iglesia Alfa y Omega.

15. Pastor Garcia resides in Phoenix, Arizona.

16. Iglesia Monte Vista is a bilingual, cross-cultural Christian church in Phoenix, Arizona.

17. A majority of the members of Iglesia Monte Vista identify as Hispanic.

18. Angel Campos is the senior pastor of Iglesia Monte Vista.

19. Pastor Campos resides in Phoenix, Arizona.

20. Iglesia Nueva Esperanza is a bilingual, non-denominational Christian church in Mesa, Arizona.

21. A majority of the members of Iglesia Nueva Esperanza identify as Hispanic.

22. Israel Camacho is the senior pastor of Iglesia Nueva Esperanza.

1 23. Pastor Camacho resides in Mesa, Arizona.

2 24. Iglesia Apostolica De La Comunidad is a Spanish-speaking, non-
3 denominational Christian church in Phoenix, Arizona.

4 25. A majority of the members of Iglesia Apostolica De La Comunidad identify
5 as Hispanic.

6 26. Cristobal Perez is the senior pastor of Iglesia Apostolica De La Comunidad.

7 27. Pastor Perez resides in Phoenix, Arizona

8 28. Helping With All My Heart, Inc. is an Arizona non-profit corporation.

9 29. Pastor Perez is the executive director of Helping With All My Heart.
10 Helping With All My Heart serves the homeless, visits rehabilitation centers, and runs a
11 food bank and jail ministry.

12 30. Helping With All My Heart's volunteers are largely composed of the
13 members of Iglesia Apostolica De La Comunidad.

14 31. Iglesia Cristiana El Buen Pastor is a Spanish-speaking, non-denominational
15 Christian church in Mesa, Arizona.

16 32. A majority of the members of Iglesia Cristiana El Buen Pastor identify as
17 Hispanic.

18 33. Hector Ramirez is the senior pastor of Iglesia Cristiana El Buen Pastor.

19 34. Pastor Ramirez resides in Mesa, Arizona.

20 35. Terence Driscoll resides in Phoenix, Arizona.

21 **Defendants**

22 36. Defendant Patriot Movement AZ is an unincorporated association based in
23 Litchfield Park, Arizona.

24 37. Defendant Patriot Movement AZ was founded by Defendants Lesa Antone
25 and Russell Jaffe in 2017.

26 38. Defendant Patriot Movement AZ maintains a public Facebook page at
27 <https://www.facebook.com/PatriotMovementAZ>, a closed Facebook group at
28 https://www.facebook.com/groups/471505516674091/?source_id=1627282800649968,

1 a YouTube account at https://www.youtube.com/channel/UCIF9j_wt1dXEF9aaO-
2 7GDpg, and a Twitter account at https://www.twitter.com/AZ_Movement.

3 39. On its Facebook page, Defendant Patriot Movement AZ describes itself as
4 a group of “Constitutional Americans who believe in America First, Capitalism, Life,
5 Liberty, and the Pursuit of Happiness” who are “active in our communities in exposing
6 the corruption of the far left agenda.”

7 40. Defendant Patriot Movement AZ has been designated as a hate group by
8 the Southern Poverty Law Center (“SPLC”).

9 41. Defendant Lesa Antone is a founder of Patriot Movement AZ.

10 42. Defendant Antone resides in Litchfield Park, Arizona.

11 43. Defendant Russell “RJ” Jaffe is a leader of Patriot Movement AZ.

12 44. Defendant Jaffe resides in Litchfield Park, Arizona.

13 45. Defendant Antonio Foreman has visited at least one church with Patriot
14 Movement AZ members in Phoenix, Arizona.

15 46. Defendant Foreman is affiliated with multiple white nationalist hate groups.

16 47. Defendant Foreman attended the August 2017 “Unite the Right” rally in
17 Charlottesville, Virginia.

18 48. Defendant Tami Jo Garver, also known as “Tami Dupra” and “Tami Jo
19 Rud,” is a member of Patriot Movement AZ.

20 49. Defendant Garver is affiliated with Defendants Harrison and Antone.

21 50. Defendant Garver resides in Glendale, Arizona.

22 51. Defendant Michael Pavlock, also known as “Mikey Lee,” is a member of
23 Patriot Movement AZ.

24 52. Defendant Pavlock resides in Peoria, Arizona.

25 53. Defendant Laura Damasco is a member of Patriot Movement AZ.

26 54. Defendant Damasco resides in Sun City West, Arizona.

27 55. Defendant “Brandi Payne,” believed to be an alias, is a member of Patriot
28 Movement AZ.

1 56. Defendant Payne has visited Arizona churches with Patriot Movement AZ
2 members on at least three occasions, including visits on December 29 and December 31,
3 2018, and January 5, 2019.

4 57. Discovery is likely to reveal the true name of Defendant Payne.

5 58. Defendant Jane Roe is a member of Patriot Movement AZ.

6 59. Defendant Jane Roe has visited at least one Arizona church with Patriot
7 Movement AZ members, including a visit on December 29, 2018.

8 60. Discovery is likely to reveal the identity of Defendant Jane Roe.

9 61. Defendant "Eduardo Jaime," believed to be an alias, is a member of Patriot
10 Movement AZ.

11 62. Defendant Jaime has visited at least one Arizona church with Patriot
12 Movement AZ members, including a visit on December 31, 2018.

13 63. Discovery is likely to reveal the true name of Defendant Jaime.

14 64. Defendant John Doe 1 is associated with Patriot Movement AZ.

15 65. Defendant John Doe 1 has visited at least one Arizona church with Patriot
16 Movement AZ members, including a visit on January 5, 2019.

17 66. Discovery is likely to reveal the identity of Defendant John Doe 1.

18 67. Defendant John Doe 2 is associated with Patriot Movement AZ.

19 68. Defendant John Doe 2 has visited Arizona churches with Patriot Movement
20 AZ members on at least two occasions, including visits on December 29 and December
21 31, 2018.

22 69. Discovery is likely to reveal the identity of Defendant John Doe 2.

23 70. Defendant AZ Patriots is an unincorporated association based in Litchfield
24 Park, Arizona.

25 71. Defendant AZ Patriots was founded on or about February 18, 2019 by
26 Defendants Jennifer Harrison and Jeremy Bronaugh, who were active members of Patriot
27 Movement AZ until that point.

1 72. Defendant AZ Patriots maintains a Facebook page at
2 <https://www.facebook.com/AZPatriotsUnited>.

3 73. Defendant AZ Patriots describes itself as “a group of committed Americans
4 bringing you live footage of the issues you care about most around Arizona. Live from
5 the border, the State Capitol and throughout Arizona’s political scene.”

6 74. Defendant AZ Patriots and its leading members have already engaged in
7 much of the same illegal conduct and rhetoric that they did as Patriot Movement AZ
8 members.

9 75. Defendant Jennifer Harrison was a member of Patriot Movement AZ from
10 at least January 2018 until approximately February 18, 2019.

11 76. Defendant Harrison resides in Peoria, Arizona.

12 77. Defendant Sean Harrison is the spouse of Defendant Jennifer Harrison.

13 78. Defendant Sean Harrison resides in Peoria, Arizona.

14 79. Defendant Jeremy Bronaugh was a member of Patriot Movement AZ from
15 at least January 2018 until approximately February 18, 2019.

16 80. Defendant Bronaugh resides in Goodyear, Arizona.

17 **COMMON ALLEGATIONS OF FACT**

18 81. Since at least October 2018, ICE has brought Immigrants who are being
19 released from ICE custody to Plaintiff churches.

20 82. Plaintiffs and their volunteers receive the Immigrants at their churches and
21 provide them with food, clothing, basic medical care, and other necessities.

22 83. Plaintiffs help the Immigrants arrange travel to their U.S. sponsors.

23 84. Plaintiffs provide overnight housing and shelter for the Immigrants.

24 85. Plaintiffs and their volunteers drive the Immigrants to bus stations or
25 airports for their travel to their U.S. sponsors.

26 86. In this way, Plaintiffs assist Immigrants who often do not speak English and
27 are unfamiliar with transportation in the United States.

1 87. Since October 2018, Plaintiffs have assisted thousands of Immigrants
2 released by ICE to reach their U.S. sponsors.

3 88. On March 21, 2019, Henry Lucero, the Phoenix field director for ICE,
4 stated, “If [the people assisting the Immigrants] were breaking the law, ICE wouldn’t give
5 them a ride there. They’re just doing something out of the goodness of their hearts. Trying
6 to help people find a way to where they’re going.”

7 89. Plaintiffs depend on donations and volunteers from their congregations and
8 the broader Phoenix community to help them to assist the Immigrants.

9 90. Plaintiffs do not receive government funding or payments to support their
10 assistance to the Immigrants.

11 91. During the first few months that they assisted the Immigrants, Plaintiffs
12 freely publicized their efforts, including on their Facebook pages and other social media,
13 and publicly solicited donations and volunteers.

14 92. Plaintiffs’ outreach resulted in considerable support from the Phoenix
15 community.

16 93. Starting about December 26, 2018, Defendants have gone to churches
17 where ICE has dropped off Immigrants many times.

18 94. Defendants’ purpose is to intimidate Plaintiffs and others to stop them from
19 assisting the Immigrants.

20 95. Many of these visits were filmed by Defendants and those videos have been
21 posted to their public Facebook pages, on YouTube, or both.

22 96. Defendants’ behavior during their visits to the churches has intimidated and
23 caused Plaintiffs anxiety and fear for their safety and the safety of others.

24 97. Uninvited or deceptively, Defendants trespassed on church property,
25 including the lawns or paths leading to the church buildings and the parking lots used by
26 the churches.

27 98. Defendants came close to people who were working at the churches, often
28 only inches away, and yelled in their faces.

1 99. Defendants held their cell phones to film people, including their faces and
2 their nametags.

3 100. At some of the visits, some of the Defendants have openly carried guns.

4 101. When the Immigrants, who were invited guests of the churches, arrived,
5 Defendants loudly yelled insults at them and at Plaintiffs.

6 102. Defendants told the Immigrants to leave and accused Plaintiffs of criminal
7 conduct—including sex trafficking or human trafficking—and of profiting financially.

8 103. These statements not only were heard by Plaintiffs' neighbors and by
9 passers-by, but also were posted online by Defendants.

10 104. Defendants have sometimes trespassed inside the church buildings
11 themselves.

12 105. Defendants ignored requests to leave the church property, or moved off the
13 property and then returned.

14 106. When asked to stop filming people, Defendants refused.

15 107. Defendants filmed children, including their faces, and posted those images
16 online.

17 108. Defendants filmed people on private property and took photographs
18 through barriers, such as by climbing on walls and by peeking through or over fences and
19 through windows.

20 109. Defendants posted their videos online and usually included the names and
21 addresses of the churches.

22 110. Defendants sometimes included the names and contact information for
23 individual pastors.

24 111. In the posted videos and on their social media, Defendants encouraged
25 others to contact the churches and the pastors.

26 112. Sometimes following these postings, Plaintiffs received social media
27 messages and telephone calls criticizing their assistance to the Immigrants, often using
28 hostile and threatening language.

1 113. These messages and calls also included threats to the pastors' buildings and
2 their families.

3 114. Defendants have also entered churches under false pretenses by posing as
4 volunteers or donors.

5 115. On February 18, 2019, Defendant Garver told a radio show host that she
6 goes "in undercover for Patriot Movement AZ to several churches to find out what's
7 actually going on on the inside of these churches."

8 116. Defendant Antone told the same radio host that Patriot Movement AZ
9 makes Garver "go play liberal" to gain access to the churches.

10 117. Similarly, Defendant Foreman stated on his Facebook page that he forced
11 his way into Iglesia Alfa y Omega as it was receiving Immigrants on January 5, 2019.

12 118. Defendant Foreman stated on his Facebook page that he told volunteers that
13 he was homeless and demanded to be fed.

14 119. Defendant Foreman was visibly armed with a gun during the encounter
15 described in paragraphs 117 to 118.

16 120. Pastors and churches within the Alliance, including Plaintiffs, learned about
17 the encounter with Defendant Foreman shortly after it occurred.

18 121. Defendants' campaign of harassment has interfered with Plaintiffs' ability
19 to assist the Immigrants.

20 122. Plaintiffs have adopted security measures to protect themselves, the
21 Immigrants, and their volunteers and donors in response to Defendants' conduct.

22 123. Many volunteers and workers have stopped wearing nametags as a result of
23 Defendants' conduct.

24 124. The number of volunteers and donations also has declined substantially as
25 a result of Defendants' conduct.

26 125. Some volunteers and donors have stated that they would not continue
27 volunteering or donating because they were intimidated by Defendants' actions.
28

1 126. Plaintiffs have stopped or decreased their public calls for support for fear
2 that publicizing their efforts or identifying the times that the Immigrants will arrive at the
3 churches would attract more harassment from Patriot Movement AZ or AZ Patriots.

4 127. This decline has placed a severe strain on Plaintiffs' resources.

5 **Iglesia Alfa y Omega**

6 128. Iglesia Alfa y Omega and Pastor Elias Garcia began assisting the
7 Immigrants in October 2018.

8 129. Defendants visited Iglesia Alfa y Omega on January 5, 2019.

9 130. Defendants Harrison, Antone, Payne, Jaime, Foreman, and Pavlock stood
10 on the sidewalk next to the parking lot, which is part of church property.

11 131. Defendants yelled insults at the church, Pastor Garcia, church members,
12 volunteers, and donors.

13 132. Defendants yelled, "These churches are complicit in human and child
14 trafficking" and "This is the United States of America and you are breaking our laws,
15 criminals."

16 133. When the ICE buses carrying Immigrants arrived, Defendants yelled insults
17 at them as well, including, "This is Third World country shit that is being released into
18 our communities!"

19 134. Defendants also filmed Immigrants as they exited the bus and zoomed in
20 on children's faces.

21 135. Despite the "no trespassing" sign on church property, Defendant Foreman
22 trespassed on church property.

23 136. Defendant Foreman later described trespassing on church property with a
24 gun on his Facebook page, the incident described above.

25 137. Defendants did not leave church property until after Pastor Garcia called
26 the police.

27 138. Defendant Antone filmed the incident on January 5, 2019, and posted the
28 video to the Patriot Movement AZ Facebook page.

1 139. As of May 1, 2019, that video had received approximately 200,000 views
2 and been shared nearly 5,000 times.

3 140. Defendants Harrison and Antone visited Alfa y Omega as it was receiving
4 Immigrants on at least two other occasions, January 2, 2019 and February 6, 2019.

5 141. Each time they behaved in a similar manner and shouted similar things at
6 the Immigrants, volunteers, and church members.

7 142. As a result of Defendants' conduct, Alfa y Omega put up no trespassing
8 signs to protect church members, the Immigrants, volunteers, and donors.

9 143. Alfa y Omega has cut back on public solicitations for volunteers and
10 donations for fear that they would attract even more harassment from Defendants,
11 resulting in a steep decline in donations.

12 144. Other congregations share the church building with Alfa y Omega. They
13 have expressed concerns about Defendants' conduct to Pastor Garcia and have asked Alfa
14 y Omega to stop assisting the Immigrants because Defendants' conduct has upset them
15 and made them afraid for their congregants' safety.

16 **Iglesia Monte Vista**

17 145. Iglesia Monte Vista and Pastor Angel Campos began assisting the
18 Immigrants in October 2018.

19 146. Defendants first visited Iglesia Monte Vista on December 28, 2018.

20 147. Defendants Harrison and Antone stood in the church parking lot, which is
21 part of church property.

22 148. When the ICE buses carrying the Immigrants arrived, Defendants Harrison
23 and Antone began yelling insults at the Immigrants, volunteers, and church members.

24 149. Defendants Harrison and Antone said that Monte Vista was "breaking the
25 law" as well as "aiding and abetting" violations of the law.

26 150. Defendants Harrison and Antone also said that they had "heard that they
27 [the Immigrants] have lice and tuberculosis."
28

1 151. Defendants approached many volunteers and asked them questions in a
2 hostile manner while filming them with their cell phones held only a few feet from the
3 volunteers' faces.

4 152. Defendants Harrison and Antone filmed the Immigrants' faces despite
5 being asked repeatedly not to do so.

6 153. When Pastor Campos informed Defendants that they were on private
7 property and asked them to leave, Defendants refused to do so and stated that they would
8 not leave until the police arrived.

9 154. Defendants did not leave church property until after Pastor Campos called
10 the police.

11 155. Defendants Harrison and Antone each filmed the December 28, 2018,
12 events and posted several videos to the Patriot Movement AZ Facebook page. Those
13 videos clearly show the faces of the Immigrants, including the faces of young children.

14 156. As of May 1, 2019, those videos had received a total of 518,000 views and
15 have been shared nearly 12,000 times.

16 157. Defendants Harrison and Antone returned to Monte Vista twice on
17 December 31, 2018.

18 158. The first time they were accompanied by Defendants Damasco, Roe, and
19 Doe 2, and stood on the sidewalk beside the church parking lot.

20 159. Using a megaphone, Defendants accused Pastor Campos of being paid to
21 assist Immigrants multiple times, chanted "shame on you," and asked "when are the
22 illegals showing up?"

23 160. Later on December 31, Defendants Harrison and Antone returned to Monte
24 Vista, this time accompanied by Defendants Pavlock, Roe, and Doe 1.

25 161. Through a megaphone, Defendants yelled insults and accusations including
26 "You're not really a house of God; you're a cash machine"; "You're not providing aid;
27 you're making bank"; and "I guess you don't get \$1,800 per head for conservatives, huh?
28 Americans just don't pay as much as illegal aliens."

1 162. Defendants also criticized Monte Vista for putting up caution tape to
2 prevent their trespassing, chanting “Tear down your wall!”

3 163. Defendant Antone argued with a volunteer as someone among the
4 Defendants chanted “punch her.”

5 164. Shortly thereafter, the police arrived and escorted the volunteer into the
6 church.

7 165. The volunteer was visibly upset. She later told Pastor Campos that she
8 would no longer volunteer because of this experience.

9 166. Defendants filmed both incidents on December 31, 2018, and posted the
10 videos to the Patriot Movement AZ Facebook page.

11 167. Defendant Damasco also separately filmed the second visit and posted it to
12 her Periscope page.

13 168. As of May 1, 2019, those videos had received a total of 99,000 views and
14 had been shared 4,700 times.

15 169. On January 2, 2019, Immigrant children were playing on the Monte Vista
16 playground, which is private property and separated from the sidewalk and street by a
17 fence.

18 170. As the children were playing, Defendants Harrison and Antone drove
19 slowly through the alley behind Monte Vista. Defendant Harrison began filming the
20 children through the fence using her cell phone.

21 171. When a church worker appeared to investigate, Defendants avoided him
22 and circled around the block in their vehicle. When they returned to the alley, the children
23 had been taken inside.

24 172. Defendants posted the January 2, 2019 video of the children to Patriot
25 Movement AZ’s Facebook page. In the video, Defendants clearly say Pastor Angel
26 Campos’s name and state: “This is a federally funded human trafficking ring.”

1 173. Referencing a pair of pants hanging on the church fence, Defendants stated:
2 “They’re bringing Little Mexico to the fence. Look, that’s how they’re drying their
3 clothes.”

4 174. The video clearly shows the faces of young Immigrant children.

5 175. As of May 1, 2019, the video had received a total of 28,000 views and had
6 been shared 693 times.

7 176. Monte Vista has received messages on its Facebook page and Pastor
8 Campos has received texts and voicemails to his personal cell phone that use the same
9 language or language similar to Defendants’ statements when they visited Monte Vista.

10 177. Pastor Campos’s minor children have seen some of those messages and
11 have expressed fear for his safety and their own.

12 178. As a result of Defendants’ conduct, Monte Vista has put up “no trespassing”
13 signs and caution tape around the boundaries of church property to protect the Immigrants
14 and volunteers.

15 179. As a result of Defendants’ conduct, Monte Vista has cut back on public
16 solicitations for volunteers and donations for fear that they would attract even more
17 harassment from Defendants, resulting in a steep decline in donations.

18 180. Pastor Campos is aware of Defendants’ conduct at other churches and was
19 particularly concerned by Defendant Foreman’s forcing his way into Iglesia Alfa y
20 Omega with a gun in late January.

21 181. Some volunteers have also told Pastor Campos that Defendants’ conduct
22 has made them afraid to continue volunteering to assist the Immigrants.

23 **Iglesia Nueva Esperanza**

24 182. Iglesia Nueva Esperanza and Pastor Israel Camacho began assisting the
25 Immigrants in October 2018.

26 183. Defendants first visited Iglesia Nueva Esperanza on January 25, 2019.

27 184. Defendants Harrison and Bronaugh approached the church shortly after an
28 ICE bus arrived to drop off Immigrants.

1 185. The church property includes a grass strip that is separated from the private
2 sidewalk by a low stone wall. Defendants stood on this grass strip while Defendant
3 Harrison shouted insults and accusations at the church, volunteers, and the Immigrants.

4 186. As the Immigrants exited the bus, Harrison shouted “fuera!” (“get out!” in
5 Spanish) and “criminals” at them.

6 187. Defendant Harrison also told a bystander: “Hopefully, ma’am, they [the
7 Immigrants] don’t get loose and rape any of those little kids.”

8 188. Defendant Harrison also yelled: “You are human trafficking at this church.”
9 She singled out Pastor Magdalena Schwartz in particular, shouting: “Magdalena, you
10 know what you’re doing. You know those kids don’t belong to those men. How much are
11 you getting paid, Magdalena? How much are you getting paid to human traffick
12 children?”

13 189. Defendant Bronaugh stood beside Harrison throughout this tirade,
14 supporting and participating in her conduct.

15 190. Defendant Harrison filmed the January 25, 2019, event using her cell
16 phone.

17 191. At one point, Defendant Harrison attempted to climb up on the stone wall
18 so that she could better film the Immigrants as they got off the bus.

19 192. When a volunteer approached her and told her that she was trespassing,
20 Harrison responded: “Aren’t they [the Immigrants] trespassing in our country, sir?” She
21 and Bronaugh refused to leave until the volunteer called the police, after which she told
22 viewers: “I’m gonna get out of here so I don’t get trespassed. Because the golden rule is:
23 You can’t trespass me if you can’t catch me!”

24 193. The video of the January 25, 2019, event was posted on Patriot Movement
25 AZ’s Facebook page.

26 194. As of May 1, 2019, the video had received a total of 64,384 views and had
27 been shared 2,361 times.

28

1 195. Defendants Harrison and Bronaugh returned to Nueva Esperanza twice on
2 February 22, 2019. They followed an ICE bus transporting the Immigrants to the church
3 in the afternoon and filmed as they exited the bus.

4 196. Defendants Harrison and Bronaugh both accused the church and volunteers
5 of breaking the law, shouting: "This church is promoting human trafficking" and later
6 chanting "Criminal! Criminal! Criminal!"

7 197. Defendant Harrison also accused the Immigrants of bringing diseases into
8 Phoenix, yelling: "Smallpox and all kinds of diseases are coming in too."

9 198. When Defendants were asked to leave the church property and the parking
10 lot, they refused. They finally left after the police arrived and spoke with them.

11 199. Defendants Harrison and Bronaugh returned to Nueva Esperanza the night
12 of February 22, 2019.

13 200. At that time, members of the community who volunteered to let Immigrant
14 families stay at their homes overnight were at the church picking up their guests.

15 201. Defendants Harrison and Bronaugh came into the parking lot where the
16 volunteers' cars were parked.

17 202. They approached within a few feet of the cars in an attempt to take video
18 of the Immigrants, their hosts, and the license plates on the cars.

19 203. When a Latino volunteer became visibly upset and accused Harrison of
20 being racist, Harrison yelled at Pastor Schwartz: "Control your dogs, Magdalena."

21 204. Defendants also repeatedly approached Pastor Schwartz, yelling at her
22 about breaking the law and being the "ring leader." They only moved away from Pastor
23 Schwartz and the volunteers when the police arrived.

24 **Iglesia Apostolica De La Comunidad / Helping With All My Heart**

25 205. Iglesia Apostolica De La Comunidad and Pastor Cristobal Perez began
26 assisting the Immigrants in November 2018 by having its members volunteer at Helping
27 With All My Heart.

28 206. Defendants began visiting Helping With All My Heart in January 2019.

1 207. For example, Defendants Harrison and Antone followed an ICE bus to
2 Helping With All My Heart on February 6, 2019.

3 208. They stood on the sidewalk mere feet from the doors of the bus as
4 Immigrants filed off, filming the Immigrants, volunteers, and church members with their
5 cell phones.

6 209. They chanted “fuera de aqui!” (“get out of here!” in Spanish) and “This is
7 not your home!” and yelled “Whose child is that? Whose child are you bringing in?” at
8 Immigrants.

9 210. They repeatedly accused the church and its volunteers of breaking the law
10 and engaging in human trafficking, shouting “This church is aiding in human trafficking.
11 That’s what you’re complicit in” and “American border patrol says this is human
12 trafficking, human smuggling!”

13 211. Defendants filmed the February 6, 2019, incident and posted the video on
14 Patriot Movement AZ’s Facebook page.

15 212. As of May 1, 2019, the video had received 52,000 views and had been
16 shared 1,800 times.

17 213. Defendants Harrison and Antone have visited Helping With All My Heart
18 at least three times.

19 214. Each time they behaved in a similar manner and shouted similar things at
20 the Immigrants, volunteers, and church members.

21 215. As a result of Defendants’ conduct, Pastor Perez and his volunteers are
22 worried every time an ICE bus comes to Helping With All My Heart.

23 216. They are aware of Defendants’ conduct at other churches and are
24 particularly concerned by Defendant Foreman’s forcing his way into Iglesia Alfa y
25 Omega with a gun in late January.

26 217. Pastor Perez feels he must spend more time protecting his volunteers; as a
27 result, he has less time to oversee the operation to assist the Immigrants.
28

1 218. Pastor Perez and Helping With All My Heart have begun hiring paid guards
2 to be present during Immigrant drop offs because of Defendants' conduct.

3 **Iglesia El Cristiana Buen Pastor**

4 219. Iglesia Cristiana El Buen Pastor and Pastor Hector Ramirez began assisting
5 the Immigrants in the Fall of 2018.

6 220. Although Defendants have not yet visited Buen Pastor, Pastor Hector
7 Ramirez and church members are aware of Defendants' conduct at other churches and are
8 particularly concerned by Defendant Foreman's forcing his way into Iglesia Alfa y
9 Omega with a gun in late January.

10 221. As a result of Defendants' conduct, Buen Pastor and Pastor Ramirez have
11 stopped advertising for volunteers and donations for fear that doing so would attract
12 harassment from Defendants.

13 222. Buen Pastor has also posted volunteers to act as security guards to attend
14 its gates while it is receiving Immigrants.

15 223. Pastor Ramirez has also volunteered to drive Immigrants to the airport.

16 224. As a result of Defendants' conduct, Pastor Ramirez has driven fewer
17 Immigrants to the airport because he believes he needs to be at Buen Pastor in case
18 Defendants show up there.

19 **Terence Driscoll**

20 225. Terence Driscoll is a volunteer who assists churches in their efforts to help
21 the Immigrants.

22 226. As part of his volunteer work, Driscoll has driven Immigrant families from
23 churches to the Phoenix airport.

24 227. On January 11, 2019, Driscoll drove an Immigrant woman and her young
25 daughter from a church to the airport.

26 228. When he arrived at the church, Driscoll observed Defendant Patriot
27 Movement AZ members in a black Dodge Charger photographing or filming in the church
28 parking lot.

1 235. Defendants have agreed to and engaged in a conspiracy to harass Plaintiffs
2 and to intimidate them into stopping their assistance to Immigrants.

3 236. Using a private Facebook group and other forms of communication,
4 Defendants circulate information regarding the dates and times that Plaintiffs will receive
5 Immigrants.

6 237. Based on this information, multiple Defendants arrive at Plaintiffs' property
7 at the same time.

8 238. Defendants sometimes share vehicles to arrive at and leave Plaintiffs'
9 property.

10 239. While at Plaintiffs' property, Defendants stand close to one another, speak
11 to one another with familiarity, and chant similar or identical things—sometimes in
12 unison.

13 240. Defendants engage in coordinated schemes to impersonate volunteers or
14 donors to enter Plaintiffs' property.

15 241. Defendants have demonstrated racial animus against the Hispanic race of
16 Plaintiffs and the Immigrants whom Plaintiffs are assisting.

17 242. Defendants' racial animus is evidenced by such acts as their targeting of
18 Hispanic churches; by their derogatory references to "Little Mexico"; by their
19 comparisons of Hispanic Immigrants to dogs; and by their repeated references to Hispanic
20 Immigrants as carriers of contagious diseases and lice.

21 243. Defendants' conspiracy is motivated by discriminatory animus against the
22 Hispanic race.

23 244. Defendants' racist animus is also evidenced by conduct unrelated to
24 Plaintiffs.

25 245. In January 2018, for instance, Defendants—including specifically
26 Defendants Jennifer Harrison and Lesa Antone—went to the Arizona capitol building to
27 protest immigration reform.
28

COUNT FIVE

(Appropriation or Invasion of the Right of Publicity)

279. Plaintiffs incorporate the allegations in the above paragraphs as if fully set forth herein.

280. Defendants have filmed the Immigrants, Alliance members, church members, volunteers, and others and posted those recordings on Defendants' Facebook pages, YouTube, and other social media accounts.

281. Defendants did not obtain consent for these recordings.

282. To film Plaintiffs, Defendants have held their cell phones up to individuals and filmed their faces, nametags, cars, and license plates.

283. Defendants used these recordings to their own advantage by both increasing hits on their Facebook pages or YouTube channels and in an attempt to further an anti-immigrant social and political agenda.

284. Defendants continued to film people even when asked not to do so.

285. Recordings included children, whose recognizable faces were posted online.

286. Defendants used Plaintiffs' identities, names, and faces without consent to advantage themselves and hurt Plaintiffs and to get more hits on social media and spread their anti-immigrant social and political agenda.

287. Defendants' wrongful conduct constitutes appropriation or invasion of the right of publicity under Arizona law.

COUNT SIX

(Intrusion into a Private Place)

288. Plaintiffs incorporate the allegations in the above paragraphs as if fully set forth herein.

289. Defendants filmed people on private property by climbing walls and fences created for the very purpose of ensuring privacy.

291. Expecting privacy behind barriers on private property is reasonable.

293. Defendants were motivated by furthering an anti-immigrant agenda centered on proving Plaintiffs were engaging in sex and human trafficking.

295. Defendants' wrongful conduct constitutes intrusion into a private place under Arizona law.

(Trespass)

297. Uninvited or deceptively, Defendants have entered onto church property, including lawns or paths leading to the church buildings and the parking lots used by the churches.

299. Defendant Foreman attempted to force himself into a church while armed with a gun.

301. Defendants intentionally entered into the property of others and at times refused to leave.

302. Defendants' wrongful conduct constitutes trespass under Arizona law.

REQUESTED RELIEF

WHEREFORE Plaintiffs respectfully request an award of the following relief:

A. A declaratory judgment that the actions described herein deprived Plaintiffs of their rights under federal and state law.

B. Injunctive relief enjoining Defendants from future violations of rights guaranteed by federal and state law.

C. Compensatory and statutory damages in an amount to be determined.

D. Punitive damages in an amount to be determined.

E. Such other relief as the Court may deem just and proper.

RESPECTFULLY SUBMITTED this 4th day of June, 2019.

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**Application for Admission Pro Hac Vice
Forthcoming*

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